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### REMARKS

Applicant thanks the Examiner for the privilege of the telephonic interview conducted on October 22, 2004. This amendment and response is provided to make the amendments discussed in the interview, and is believed to place the application in a condition for allowance. As such, Applicant respectfully requests entry of the present amendment and reconsideration and allowance of the application in view of the amendments made herein.

### Claim Amendments

During the telephone conversation of October 22, 2004 between the Examiner and the undersigned attorney of record, the Examiner indicated that the application may be placed in a condition for allowance if the claims were amended to clarify that the power feed equipment and the electrical connector are located on separate landmasses. Accordingly, independent claim 1 has been amended to incorporate the limitations of claim 2 (which has been cancelled), and to require that "said first landmass [be] separated from said second and third landmasses by a body of water." Independent claim 11 has been amended to require that "said at least one additional landmass being separated from said first and second landmasses by a body of water."

It is believed that claims 1 and 11, as amended, clearly require the "electrical connector" and the "power feed equipment" to be located on separate landmasses. Support for these amendments may be found throughout the specification and drawings, e.g. in FIGS. 5-7, etc.

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**35 U.S.C. §102 Rejection**

Claims 1, 5, 6, 9, 10 and 21 stand rejected under 35 U.S.C. § 102(b) as being anticipated by Crameri et al. (U.S. Patent No. 6,166,836). Applicant respectfully traverses this rejection.

Again, Crameri teaches an example of a submarine branching unit. The branching unit may be located in the sea for connecting optical cables emanating from "transmit/receive" stations. FIG. 1, and Col. 3, lines 24-31. Three "transmit/receive" stations, i.e. stations 20, 22 and 28, are coupled directly to the branching unit 10 via cables 16, 18 and 24, respectively. Crameri specifically states, with reference to FIG. 1, that each of the "transmit/receive" stations 20, 22, and 28 feeds current to the branching unit 10:

"FIG. 1 shows the normal operation of the circuit in the absence of a trunk fault. The arrows indicate, in terms of conventional current, the direction of current flow when a positive potential is applied from station 20 and a negative potential from station 22" (Col. 3, line 66 to Col. 4, line 3) (emphasis added); and

"In order to reestablish a flow of current from the trunk section 16 a negative potential is applied by the spur station 28..." (Col. 4, lines 13-15) (emphasis added).

Each "transmit/receive" station 20, 22 and 28 in Crameri thus acts as a current source coupled directly to the branching unit.

Independent claim 1, however, requires a configuration including a first cable for carrying data signals between "a first landmass and a second landmass", a second cable for carrying data signals between "the first landmass and a third landmass", a "first piece of power feed equipment...located on the second landmass", a "second piece of power feed equipment...located on the third landmass" and an electrical power connector "located on said first landmass" for connecting power conductors of the first and second cables to allow flow of current "between said first and second pieces of power feed equipment", "wherein no separate

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current source located on the first landmass is coupled to said electrical power connector.”

(emphasis added). Claim 1, as amended, further requires that the “first landmass [be] separated from said second and third landmasses by a body of water.” (emphasis added).

Applicant finds nothing in Crameri that teaches or suggests a system including the limitations of amended claim 1. Crameri clearly requires that each of the “transmit/receive” stations 20, 22, 28 be coupled to the branching unit 10 to act as a current source. If the branching unit 10 is located on a landmass and the “first” and “second” cables are cables 16 and 18, respectively, as suggested by the Examiner, then “transmit/receive” station 28 would be a current source coupled to the connector on the first landmass. Moreover, even if the branching unit 10 of Crameri were located on a landmass, applicant finds nothing in Crameri that teaches or suggests that the landmass on which the branching unit would be located should be separated by a body of water from second and third landmasses on which power feed equipment is located.

Crameri thus fails to teach essential limitations of claim 1 requiring a first piece of power feed equipment on a “second landmass”, a second piece of power feed equipment on a “third landmass”, and an electrical power connector a “first landmass”, the “first landmass being separated from said second and third landmasses by a body of water”, wherein “no separate current source is coupled to said electrical power connector on said first landmass.” As such, applicant respectfully submits that the rejection of claim 1 under 35 USC § 102(b) cannot stand. Claims 5, 6, 9, 10 and 21 depend from claim 1. These claims are in condition for allowance by virtue of their dependency for the reasons adduced above, as well as for their own limitations. Accordingly, applicant respectfully requests that the rejection of claims 1, 5, 6, 9, 10 and 21

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under 35 U.S.C. § 102(b), as being anticipated by Crameri (U.S. Patent No. 6,166,836) be withdrawn upon reconsideration.

### **35 U.S.C. §103 Rejection**

Claims 2-4, 7, 8, 11-15, 20, 22 and 23 stand been rejected under 35 U.S.C. § 103(a) as being unpatentable over Crameri in view of the prior art figures submitted by the applicant. Applicant respectfully traverses this rejection.

Independent claim 11, as amended, requires a "plurality of cable segments" that are electrically connected "in series" between a positive terminal of a first piece of power equipment on a "first landmass" and a negative terminal of a second piece of power feed equipment on a "second landmass" by at least one "electrical power connector located on at least one additional landmass", "said at least one additional landmass being separated from said first and second landmasses by a body of water", and "wherein no separate current source is coupled to said electrical power connector on said at least one additional landmass."

There is nothing in Crameri that would have led one skilled in the art to the claimed invention of claim 11 at the time it was made. As discussed above, Crameri specifically teaches that each "transmit/receive" station coupled to the branching unit should act as a current source, and fails to teach an electrical connector located on a landmass separated by a body of water from landmasses on which power feed equipment is located. Crameri thus fails to teach or suggest essential limitations of the claimed invention. Applicant's prior art figures do not provide the missing teachings.

Claims 12-15 and 22-23 depend, either directly or ultimately, from independent claim 11

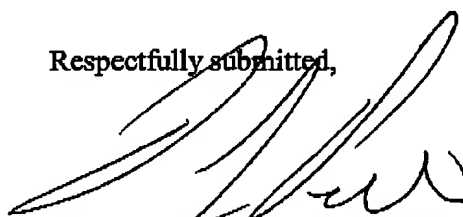
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and are allowable over Crameri combined with applicant's prior art figures for the reasons adduced above by virtue of their dependency, as well as for their own limitations. Claims 2-4, 7, 8 and 20 depend, either directly or ultimately, from independent claim 1 which is allowable over Crameri combined with applicant's prior art figures for the reasons adduced above, as well as for their own limitations. Accordingly, it is requested that the rejection of claims 2-4, 7, 8, 11-15, 20, 22 and 23 under 35 U.S.C. §103(a) in view of Crameri and applicant's prior art figures be withdrawn upon reconsideration.

In light of the foregoing remarks, it is believed that all of the presently pending claims are in a condition for allowance. Entry of the present amendment and allowance of the application are respectfully requested. In the event the Examiner deems personal contact desirable in disposition of this application, the Examiner is respectfully requested to call the undersigned attorney at (603) 668-6560.

No fees are believed to be due. In the event there are any fee deficiencies, please charge them (or credit any overpayment) to our Deposit Account No. 50-2121.

Respectfully submitted,



Donald J. Perreault, Attorney For Applicants  
Registration No. 40,126  
GROSSMAN, TUCKER, PERREAULT  
& PFLEGER, PLLC  
55 South Commercial Street  
Manchester, NH 03101  
Ph: 603-668-6560  
Fx: 603-668-2970